

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 05-30057-MAP
)	
v.)	
)	
NAOMI WATFORD, Defendant)	

DEFENDANT'S REQUEST FOR EVIDENTIARY HEARING

Defendant Naomi Watford hereby requests that this court afford her an evidentiary hearing on the issue of whether there has been an adequate "safety valve" proffer. She further requests that the evidentiary hearing itself be closed to the public, with certain exceptions.

1. Sentencing in this case is set for December 13, 2006 at 2:00p.m. Defendant is facing a 10-year mandatory minimum unless she has met the proffer requirement of the "safety valve" provisions. It appears now that the government does not agree that her proffer was adequate.

2. The safety valve proffer was given to the prosecutor and an agent for the government, as contemplated by the rule. As is usual, the proffer was not open to the public. Whereas Ms. Watford and her family were victims of a violent home invasion following a newspaper report that Ms. Watford had pled guilty in this case, undersigned counsel is concerned for her safety if a hearing on her safety valve proffer is held in public.

RESPECTFULLY,
NAOMI WATFORD, By Her Attorney,

s/ Myles Jacobson

Date: December 7, 2006

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